

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

DATA CLOUD TECHNOLOGIES, LLC,	X	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
SQUARESPACE, INC.	:	C.A. No. 21-cv-164-LPS
	:	
Defendant.	:	
	:	

**DECLARATION OF JAMES R. KLAIBER**

1. My name is James R. Klaiber. I am a member of the Bar of the State of New York and am Counsel to Hughes Hubbard & Reed LLP, co-counsel for defendant Squarespace, Inc. in this action. I have personal knowledge of the matters stated in this declaration.

2. Annexed hereto as Exhibit 1 is a copy of a web page that was transmitted to me on August 23, 2021, when I queried <http://www.ipigrp.com>.

3. Annexed hereto as Exhibit 2 are copies of e-mail communications dated May 5, May 11, May 12, and May 13, 2021, between me and one Bill Hartselle, who held himself out as a representative of the Plaintiff and whose e-mail address was [bhartselle@ipigrp.com](mailto:bhartselle@ipigrp.com).

4. Annexed hereto as Exhibit 3 is an e-mail dated June 18, 2021, that I received from attorney James F. McDonough, III.

5. Annexed hereto as Exhibit 4 are copies of e-mail communications dated August 5 and 9, 2021, between me and attorney James F. McDonough, III.

I, James R. Klaiber, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated August 25, 2021

/s/ James R. Klaiber